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December 1, 2006

**BY ECF**

Hon. Cheryl L. Pollak  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Marti v. Atlantic Maintenance Corp.  
06 Civ. 809 (NG)(CLP)**

Dear Magistrate Judge Pollak:

We represent the Defendant, Atlantic Maintenance Corp. ("Atlantic"), in the above-referenced action. We write, specifically, in response to the request of Brian L. Bromberg, Esq. of Bromberg Law Office, P.C., in his November 30, 2006 letter to Your Honor, for an "in-person conference".<sup>1</sup>

On the day before Mr. Bromberg's letter, in our November 29, 2006 letter to Your Honor, we suggested that, in the event Mr. Michael Craig did not file a written "verification", there be "a conference before Your Honor on '12/8', or at any other time, to be attended by Mr. Michael Craig." The sole purpose of such a conference would be to verify Mr. Michael Craig's desire to be (1) an individually named Plaintiff, (2) the Representative of the putative collective action,

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<sup>1</sup> It must be noted that there is virtually nothing of substance in Mr. Bromberg's letter – commencing with the letter's first sentence that "[w]e [Bromberg Law Office, P.C. and perhaps Locks Law Firm and/or Berger & Gottlieb] represent Plaintiffs Luis Marti and Michael Craig in the above-referenced case" - that is accurate. Neither Mr. Bromberg nor any of the other lawyers represents anyone, or otherwise has a basis for appearing in this matter.

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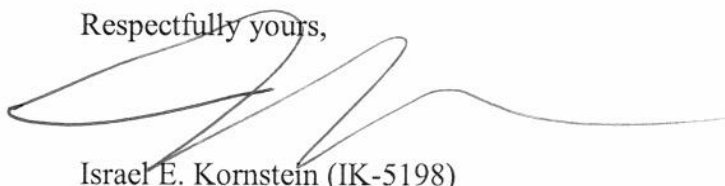
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and (3) the Representative of the putative class action. Of course, Mr. Bromberg does not request an "in-person conference" with Mr. Michael Craig in attendance.

Similarly, the reason for the request that "Your Honor forgo the requirement of a verified answer [*sic*]" by Mr. Michael Craig, made by Fran Rudich, Esq. of the Locks Law Firm, in her November 27, 2006 letter to Your Honor, now is fully apparent. Mr. Michael Craig would not verify his desire to "substitute" for Mr. Marti.

Thus, pursuant to Your Honor's November 20, 2006 Minute Order, we respectfully urge that someone must "file amended *verified* complaint with new plaintiff(s) by 12/8 or indicate that they are willing to dismiss". (Emphasis supplied)

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Israel E. Kornstein', with a long horizontal flourish extending to the right.

Israel E. Kornstein (IK-5198)

IEK:tc

cc: Locks Law Firm (by ECF)  
Berger & Gottlieb (by ECF)  
Brian L. Bromberg, Esq. (by ECF)